

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

MAXX LYMAN, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

GLOBE LIFE, INC.,

Defendant.

Civil Action No. 4:23-cv-00911-SDJ

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY

Defendant Globe Life, Inc. (“Globe Life”) files this Unopposed Motion for Extension of Time to file its Reply in Support of its Motion to Dismiss Plaintiff’s Amended Complaint and would respectfully show as follows:

1. Plaintiff Maxx Lyman (“Plaintiff”) filed its original Complaint on October 13, 2023. ECT No. 1. Globe Life filed its Motion to Dismiss on November 15, 2023. ECF No. 7.

2. Plaintiff filed its Amended Complaint on November 21, 2023. ECF No. 9. Globe Life filed its Motion to Dismiss Plaintiff’s Amended Complaint on December 5, 2023. ECF No. 11. Plaintiff filed its Response in Opposition on December 19, 2023, the same day as this filing. ECF No. 13. Thus, pursuant to the Local Rules, Globe Life’s reply is currently due on December 26, 2023. E.D. Tex. L.R. CV-7(f).

3. Globe Life now seeks a brief seven-day extension of this deadline to file its reply. Plaintiff’s counsel has confirmed that Plaintiff does not oppose this requested extension.

4. Good cause exists to extend this deadline as Globe Life needs additional time to fully respond to each of the arguments set forth in the Response. Additionally, the requested

extension of time is sought due to the upcoming Christmas and New Year holidays. This extension does not delay the progress of the matter.

5. Accordingly, Globe Life requests that the Court extend its deadline to file its reply in support of its Motion to Dismiss Plaintiff's Amended Complaint (ECF No. 11) to **January 2, 2024**. *See* FED R. CIV. P. 6(b)(1) (noting that the court can extend a deadline for "good cause" when the request is made prior to the expiration of the deadline).

Respectfully Submitted,

ALSTON & BIRD LLP

/s/ Emily A. Fitzgerald

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Counsel for Defendant Globe Life, Inc.

CERTIFICATE OF CONFERENCE

I hereby certify that on December 19, 2023, I conferred with counsel for Plaintiff Maxx Lyman in accordance with Local Rule CV-7(h). Plaintiff is unopposed to the relief sought in this Motion.

/s/ Emily A. Fitzgerald
Emily A. Fitzgerald

CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2023, I caused to be served true and correct copies of the foregoing document by filing such notice with the Court's CM/ECF system.

/s/ Emily A. Fitzgerald
Emily A. Fitzgerald